

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Oxford Health Insurance Inc., Oxford Health Plans(NY) et al

(In the space above enter the full name(s) of the plaintiff(s)/petitioner(s).)

13 Civ. 375 (AKH) ()

- against -

Estate of Anne M. Christopher

(In the space above enter the full name(s) of the defendant(s)/respondent(s).)

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
- C# 3813
DATE FILED: 3/8/13

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the annexed affirmation of Allan Christopher,
(name)affirmed on March 5, 2013, and upon the exhibits attached thereto (delete if no
(date)

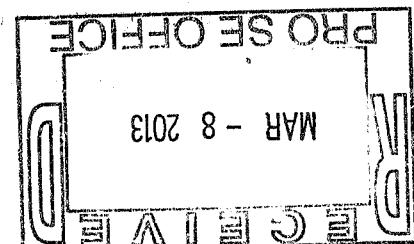
exhibits); the accompanying Memorandum of Law in support of this motion (delete if there is no

Memorandum of Law), and the pleadings herein, plaintiff/defendant will move this Court, before
(circle one)Judge Hellerstein, United States District/Magistrate Judge, for an order
(Judge's name) (circle one)pursuant to Rule _____ of the Federal Rules of Civil Procedure granting (state what you want the
Judge to order): Extension of Time of 45 days starting with March 5, 2013 as the first day and with April 18, 2013 as
the last day to Answer Complaint. Agreement made with Plaintiff's lawyer per attached email. Extension needed
to address material and substantive issues and obtain legal counsel. Summons was received on
February 27, 2013 from Westport, CT District Probate Court. Please see attached email with arrow highlight ➔

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Bedford, NH
(city) March 5, 2013
(month) (day) (year)Signature Allan L. Christopher
Address 9 Willowbrook Court
Bedford NH, 03110
Telephone Number 603-472-5271
Fax Number (if you have one) _____

Rev. 05/2007



XFINITY Connect

allanchristopher@comcast.net

Font Size**FW: Request that You Please Call Me Immediately Regarding Summons & Complaint for Estate of Anne M. Christopher****From :** John Seybert <John.Seybert@sedgwicklaw.com>

Tue, Mar 05, 2013 05:11 PM

Subject : FW: Request that You Please Call Me Immediately Regarding Summons & Complaint for Estate of Anne M. Christopher

3 attachments

To : allanchristopher@comcast.net**Cc :** Michael Bernstein <Michael.Bernstein@sedgwicklaw.com>

Mr. Christopher,

I am responding to your email since I am the one who spoke with you. Your email seems to be asking about legal guidance on how to defend this action. As I explained to you during our call on February 27, 2013, our firm represents the plaintiffs, and I cannot provide you with legal guidance.

I want to clarify a few points in your email. I spoke to you twice on February 27, 2013. In the first call, I told you I would speak with Michael Bernstein and call you back, which I did that same night. I did not represent that plaintiffs would be interested in dismissing the complaint against the Estate of Anne M. Christopher. Plaintiffs have named the Estate as a defendant in the action and we served the Estate with the Summons and Complaint. Accordingly, we have no intention of dismissing the action against the Estate. I did not understand our discussion to have any remaining issues after my second call with you.

As I understand your first request in your email of today, you are requesting an extension of time to answer the complaint. You may advise the Court that we consent to a 45-day extension of time. With regard to your second request, for the reasons stated above, we cannot provide you with legal research and advice about the basis for plaintiffs' claims against the Estate. Also, in response to your third request, attached is a copy of the Complaint and Summons.

I trust that this addresses the issues you raised in your email. To avoid any further confusion about what was discussed, please email me any requests or issues you want to raise.

Very truly yours,
John**John T. Seybert**
John.Seybert@sedgwicklaw.com | +1-212-898-4028

From: allanchristopher@comcast.net [mailto:allanchristopher@comcast.net]
Sent: Tuesday, March 05, 2013 11:35 AM
To: Bernstein, Michael
Cc: DAVID CHRISTOPHER; Thelma Christopher
Subject: Request that You Please Call Me Immediately Regarding Summons & Complaint for Estate of Anne M. Christopher

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Oxford Health Insurance Inc., Oxford Health Plans(NY) et al

(In the space above enter the full name(s) of the plaintiff(s)/petitioner(s).)

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- against -

Estate of Anne M. Christopher

**AFFIRMATION IN
SUPPORT OF MOTION**

(In the space above enter the full name(s) of the defendant(s)/respondent(s).)

I, Allan Christopher, affirm under penalty of perjury that:

1. I, Estate of Anne M. Christopher, am the plaintiff/defendant in the above entitled action,
and respectfully move this Court to issue an order To extend time to answer complaint to 45 days.
(state what you want the Judge to order)

2. The reason why I am entitled to the relief I seek is the following (state all your reasons using additional paragraphs and sheets of paper as necessary): Received Summons & Complaint in regular mail on February 27, 2013. Need to find a Probate lawyer to represent me who has admission to SDNY Fed. Court, CT Court. Need to research complex substantive and material aspects of complaint & legal basis of complaint before providing Answer. Do not have a law background which makes it challenging and time consuming.

WHEREFORE, I respectfully request that the Court grant this motion, as well as such other and further relief as may be just and proper.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Bedford, NH
(city) March 5, 2013
(month) (day) (year)

Signature Allan C. Christopher
Address 9 Willowbrook Court
Bedford NH 03110
Telephone Number 603-472-5271
Fax Number (if you have one) _____

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Oxford Health Insurance Inc., Oxford Health Plans(NY) et al

(List the name(s) of the plaintiff(s)/petitioner(s).)

13 Civ. 375 (AKH) ()

- against -

AFFIRMATION OF SERVICE

Estate of Anne M. Christopher

(List the name(s) of the defendant(s)/respondent(s).)

I, (print your name) Allan Christopher, declare under penalty of perjury that I served a copy of the attached (list the names of the documents you served): 1) Motion of Moton for time extension to Answer (with one page attachment 2) Affirmation in Support of Motion (for time extension)

upon all other parties in this case by (state how you served the documents, for example, hand delivery, mail, overnight express) standard USPS mail to the following persons (list the names and addresses of the people you served):

1) Michael Bernstein, Esq, 225 Liberty Street 28th Floor New York, New York 10281-1008
2) John Seybert Esq, Sedgwick LLP, 225 Liberty Street, 28th Floor, New York, New York 10281-1008

on (date you served the document(s)) Mailed from Bedford NH, March 6, 2013

March 6, 2013

Dated

Allan L. Christopher

Signature

9 Willowbrook Court

Address

Bedford NH, 03110

City, State

03110

Zip

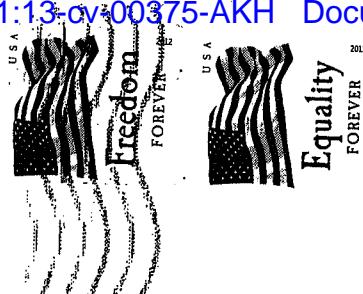
603-472-5271

Telephone Number

allanchristopher@comcast.net

E-Mail Address

Allen Christopher
Sullivan County
Refiled NY 03/10



United States District Court at Southern District of New York

Pro Se Office

Daniel Patrick Moynihan United States Courthouse

500 Pearl Street, Room 200
New York, New York 10007

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PRO SE OFFICE
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